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*Jiangtian Sun and Sun Time Piece Trade, LLC*

6  
7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9  
10 HAYDEN KHO, JR., and VICTORIA G.  
BELO, individually, and as husband and  
11 wife,

12 Plaintiffs,

13 v.

14 JIANGTIAN SUN, individually, and SUN  
TIME PIECE TRADE, LLC, a Nevada  
15 Limited Liability Company; DOES 1 through  
10, inclusive; DOES & ROES  
16 CORPORATIONS ENTITIES 1 through 10  
inclusive;

17 Defendants.  
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Case No. 2:19-cv-00596-JCM-CWH

**JOINT STIPULATION AND  
[PROPOSED] ORDER EXTENDING  
TIME FOR SPECIALLY APPEARING  
DEFENDANTS JIANGTIAN SUN AND  
SUN TIME PIECE TRADE, LLC TO  
FILE RESPONSIVE PLEADING TO  
PLAINTIFFS' COMPLAINT**

Complaint Filed: April 8, 2019

Current Response Deadline:

May 1 and 3, 2019

Proposed New Response Deadline:

May 22, 2019

1 Plaintiffs Hayden Kho, Jr. and Victoria G. Belo (“Plaintiffs”) and Specially Appearing  
2 Defendants Jiangtian Sun and Sun Time Piece Trade, LLC (“Specially Appearing Defendants”)  
3 by and through their respective counsel of record, hereby stipulate and agree, with the Court’s  
4 approval, as follows:

5 **RECITALS**

6 WHEREAS, Plaintiffs filed a complaint (the “Complaint”) in this action initiating Case  
7 No. 2:19-cv-00596-JCM-CWH on April 8, 2019 (*See* ECF No. 1.);

8 WHEREAS, Specially Appearing Defendants’ deadline to answer or otherwise respond to  
9 Plaintiffs’ Complaint is currently May 1 and 3, 2019;

10 WHEREAS, Plaintiffs agree to an extension until May 22, 2019 for the Specially  
11 Appearing Defendants to respond to the Complaint due to Specially Appearing Defendants recent  
12 acquisition of counsel;

13 WHEREAS, the Specially Appearing Defendants have not previously sought any  
14 extensions of time to respond to the Complaint;

15 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through  
16 their counsel, as follows:

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- 1           • Specially Appearing Defendants will file their responsive pleading to the Complaint  
2           by or on May 22, 2019.

3 **SO STIPULATED.**

5 DATED: May 13, 2019

**ENENSTEIN PHAM & GLASS**

7 By: 

8 ROBERT A. RABBAT, ESQ.  
9 *Attorney for Specially Appearing*  
10 *Defendants Jiangtian Sun*  
11 *a/k/a John Sun d/b/a as Sun Time*  
12 *Piece Trade, LLC*

12 DATED: May 10, 2019

**THE THATER LAW GROUP, P.C.**

13 /s/ Maile Lane Esteban-Trinidad  
14 MAILE LANI ESTEBAN-TRINIDAD  
15 Attorney for Plaintiffs Hayden Kho, Jr. and  
16 Victoria G. Belo

17 **IT IS SO ORDERED:**

19 DATED: May 15, 2019

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20 UNITED STATES MAGISTRATE JUDGE